

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1. STATE OF OKLAHOMA, ex rel. )  
W.A. DREW EDMONDSON, in his )  
capacity as ATTORNEY GENERAL OF )  
THE STATE OF OKLAHOMA and )  
OKLAHOMA SECRETARY OF THE )  
ENVIRONMENT C. MILES TOLBERT, )  
in his capacity as the TRUSTEE FOR )  
NATURAL RESOURCES FOR THE )  
STATE OF OKLAHOMA, )  
Plaintiff, )

v. )

Case No. 4:05-cv-00329-JOE-SAJ

1. TYSON FOODS, INC., )  
2. TYSON POULTRY, INC., )  
3. TYSON CHICKEN, INC., )  
4. COBB-VANTRESS, INC., )  
5. AVIAGEN, INC., )  
6. CAL-MAINE FOODS, INC., )  
7. CAL-MAINE FARMS, INC., )  
8. CARGILL, INC., )  
9. CARGILL TURKEY )  
PRODUCTION, LLC, )  
10. GEORGE'S, INC., )  
11. GEORGE'S FARMS, INC., )  
12. PETERSON FARMS, INC., )  
13. SIMMONS FOODS, INC., and )  
14. WILLOW BROOK FOODS, INC., )  
Defendants. )

**MOTION BY THE STATE OF OKLAHOMA'S COUNSEL TO ADMIT  
CO-COUNSEL *PRO HAC VICE***

COMES NOW Richard T. Garren, counsel of record for Plaintiff, The State of Oklahoma, and pursuant to LCvR 83.3(J) hereby moves for the admission *pro hac vice* of South Carolina attorney William H. Narwold, who will serve as co-counsel for the aforementioned Plaintiff if so admitted.

If this motion is granted by the Court, the undersigned Richard T. Garren and his law firm will continue to serve as counsel for the aforementioned Plaintiff in the instant action.

Submitted simultaneously with the filing of this motion is tender of the required \$75.00 fee to the Clerk of this Court. In support of this motion, a Request for Admission *Pro Hac Vice* has been attached and marked as Exhibit "A."

The granting of this motion and admission of William H. Narwold to serve as co-counsel for the aforementioned Plaintiff will cause no delay in this action and will not cause any opposing party to suffer prejudice or hardship. Movant believes that William H. Narwold is eligible for admission to the Bar of this Court, and Movant respectfully requests that the Court exercise its discretion to admit William H. Narwold *pro hac vice*.

A proposed order accompanies this motion.

Respectfully submitted,

RIGGS, ABNEY, NEAL, TURPEN,  
ORBISON & LEWIS

By: 

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502 West 6th Street  
Tulsa, Oklahoma 74119-1010  
918/587-3161  
918/583-1549 - fax  
Attorneys for Plaintiff  
The State of Oklahoma

CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the above and foregoing pleading was mailed this 30 day of June, 2005, to:

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/s/ Richard T. Garren

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Defendants. )

**APPLICATION FOR ADMISSION OF ATTORNEY *PRO HAC VICE***

I, William H. Narwold, request admission *Pro Hac Vice* for the purpose of representing the Plaintiff, The State of Oklahoma, in this action. In support of this application, I represent that the following is true and correct:

1. My name is William H. Narwold.

EXHIBIT "A"

2. I am an attorney in the law firm of Motley Rice LLC. My business address, telephone number and fax number are as follows:

Motley Rice LLC  
20 Church Street, 17<sup>th</sup> Floor  
Hartford, CT 06103  
(860) 882-1676 - Voice  
(860) 882-1682 – Facsimile  
bnarwold@motleyrice.com

3. I was admitted to the Connecticut State Bar in 1979. I am licensed and in good standing in this jurisdiction. My Connecticut Juris Number is 300110.

4. I am admitted to practice law and am in good standing in the United States District Court for the District of Connecticut, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, and the United States District Court for the District of Colorado. A copy of a Certificate of Good Standing from the District of Connecticut is attached hereto.

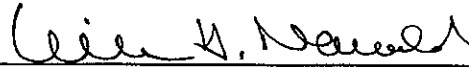
5. I have never been denied admission, disbarred, suspended for practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee, or administrative body. No proceedings which could lead to any such disciplinary action have ever been instituted against me in any such bodies.

6. I am familiar with the rules of evidence and the local rules of this Court.

7. I have associated with the Oklahoma law firm of Riggs, Abney, Neal, Turpen,

Orbison & Lewis, 502 West 6<sup>th</sup> Street, Tulsa, OK 74119, for the purpose of this litigation.

DATED this 16<sup>th</sup> day of June, 2005.



William H. Narwold, Connecticut Juris No. 300110  
Motley Rice LLC  
20 Church Street, 17<sup>th</sup> Floor  
Hartford, CT 06103  
(860) 882-1676 - Voice  
(860) 882-1682 - Facsimile  
[bnarwold@motleyrice.com](mailto:bnarwold@motleyrice.com)

AO 136 (Rev. 4/94)

## CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

DISTRICT OF CONNECTICUT

William H. Narwold

BAR #:

ct00133

I, **Kevin F. Rowe**, Clerk of the United States District Court, District of Connecticut,

DO HEREBY CERTIFY that William H. Narwold was  
duly admitted to practice in said Court on June 4, 1979,  
and is a member in good standing of the bar of said Court.

Dated at Hartford, Connecticut

Kevin F. Rowe

Clerk

on June 9, 2005

  
Deputy Clerk